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December 9, 2024

By ECF

Honorable Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

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Re: *Knight v. New York City Transit Authority*, Civil Action No. 19-cv-1428 (PKC) (LB)

Dear Judge Chen:

We represent Defendant New York City Transit Authority in connection with the above-referenced matter and write to respectfully request an extension of time for Defendant to submit its opposition to Plaintiff's Amended Motion for Reconsideration (ECF No. 126) pending resolution of Defendant's Motion to Strike Plaintiff's Amended Motion for Reconsideration ("Motion to Strike") (ECF No. 127).

On November 27, 2024, Plaintiff filed her Amended Motion for Reconsideration,¹ which was 43 pages in length, well beyond the 10-page limit for supporting memorandums of law imposed by Local Civil Rule 6.3.

On December 9, 2024, Defendant filed their Motion to Strike (ECF No. 127), requesting that this Court strike Plaintiff's motion and requiring her to file a memorandum of law which complies with Local Civil Rule 6.3. Defendant believes that an extension of time is necessary and warranted, as it should not be required to respond to a brief that is more than triple the Court's page limit.

This is Defendant's second request for an extension of time in connection with Plaintiff's motion for reconsideration. Defendant asked Plaintiff whether or not she consents to this extension request, but as of the filing of this letter motion, have not yet heard from her.

Respectfully submitted,

/s/ Michelle A. Annese

cc: All Counsel of Record (by ECF)
Christine N. Knight (by email – 4yomind@gmail.com)

¹ On or about November 22, 2024, Plaintiff filed a letter motion for reconsideration that was 18 pages in length, also in violation of Local Civil Rule 6.3 (ECF No. 125); that motion was entered on the docket on November 25, 2024. On November 23, 2024, Plaintiff filed her Amended Letter Motion for Reconsideration (ECF No. 126), which was entered on the docket on November 27, 2024 and was first received by Defendant on that same day.